



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

In Reply Refer To:
FWS/R4/DH NRDAR

JAN 22 2014

Memorandum

To: Field Supervisor, Panama City Ecological Services Office

From: Deputy Deepwater Horizon, Department of the Interior Natural Resource Damage Assessment and Restoration (NRDAR), Case Manager

Subject: Informal Consultation and Conference Request for the Proposed Shell Point Beach Nourishment Project, Wakulla County, Florida

RECEIVED
2/17/14

As you are no doubt aware, on or about April 20, 2010, the mobile offshore drilling unit *Deepwater Horizon* experienced an explosion, leading to a fire and its subsequent sinking in the Gulf of Mexico (the Gulf). These events resulted in the discharge of millions of barrels of oil into the Gulf over a period of 87 days. In addition, various response actions were undertaken in an attempt to minimize impacts from spilled oil. These events are hereafter collectively referred to as the Oil Spill.

The Department of the Interior (DOI), acting through the U.S. Fish and Wildlife Service (the Service) and other Bureaus, is a designated natural resource trustee agency authorized by the Oil Pollution Act of 1990 (OPA) and other applicable federal laws to assess and assert a natural resource damages claim for this Oil Spill. DOI is only one of several Trustees, including agencies of the State of Florida, so authorized. Consistent with their federal and state authorities, the Trustees are investigating the resource injuries and losses that occurred as a result of the Oil Spill and have initiated restoration planning to identify the actions that will be needed or appropriate to restore injured resources and to make the public whole for the injuries and losses that occurred. This process is known as a Natural Resource Damage Assessment (NRDA).

On April 20, 2011, DOI, NOAA, and the Trustees for the five Gulf states affected by the Oil Spill entered into an agreement with BP, a responsible party for the Oil Spill, under which BP agreed to provide \$1 billion for early restoration projects in the Gulf to address injuries to natural resources caused by the Oil Spill. The subject project is being evaluated by the Trustees as a potential early restoration project. The early restoration project has been proposed in a draft early restoration plan that was released for public comment and review on December 6, 2013. If the Trustees select the project after consideration of public comment and a stipulated agreement is reached with BP, the early restoration project will be implemented by the State of Florida. DOI, acting through the Service, will be a co-Trustee for the project, if it is selected and implemented.

The above facts lead us to the conclusion that consultation under Section 7 of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*), is required for the proposed project and we wish to engage in such consultation. Accordingly, we have reviewed the

proposed Shell Point Beach Nourishment Project, Wakulla County, Florida project for potential impacts to listed, candidate, and proposed species and designated and proposed critical habitats in accordance with Section 7 of the ESA. We determined the proposed project may affect, but is not likely to adversely affect, piping plover and red knot (if listed) and have provided our analysis in the attached Biological Evaluation. We have also reviewed the proposed project for impacts to bald eagles and migratory birds in accordance with the Bald and Golden Eagle Protection Act (BGEPA) of 1940 (16 U.S.C. 668-668c) and the Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703–712), respectively. All of the proposed work is above high tide line; therefore, consultation with National Marine Fisheries Service in regards to ESA or Marine Mammal Protection Act (MMPA) of 1972, as amended (16 U.S.C. 1461 *et seq.*) is not necessary.

We request your review of and concurrence with the attached intra-Service Section 7 Biological Evaluation form describing the proposed project, potential effects, conservation measures and justifications for our determinations. If you have questions or concerns regarding this request for consultation, please contact Holly Herod, Fish and Wildlife Biologist, at 404-679-7089 or holly_herod@fws.gov.

Attachment

**SOUTHEAST REGION
INTRA-SERVICE SECTION 7
BIOLOGICAL EVALUATION FORM**

Originating Person: Holly Herod; prepared by David Mills (representing the State of Florida Natural Resource Trustees – The Florida Department of Environmental Protection and the Florida Fish and Wildlife Conservation Commission)

Telephone Number: Holly Herod: 404-679-7089; Dave Mills 303-381-8248

E-Mail: holly_herod@fws.gov; dmills@stratusconsulting.com

Date: December 12, 2013

PROJECT NAME (Grant Title/Number): Shell Point Beach Nourishment Project

I. Service Program:

- ☒ **NRDAR**
- ☐ **Ecological Services**
- ☐ **Federal Aid**
 - ☐ **Clean Vessel Act**
 - ☐ **Coastal Wetlands**
 - ☐ **Endangered Species Section 6**
 - ☐ **Partners for Fish and Wildlife**
 - ☐ **Sport Fish Restoration**
 - ☐ **Wildlife Restoration**
- ☐ **Fisheries**
- ☐ **Migratory Birds**
- ☐ **Refuges/Wildlife**

II. State/Agency: Florida Department of Environmental Protection (DEP) and Florida Fish and Wildlife Conservation Commission (FWC)

III. Station Name: DOI Deepwater Horizon Case Management Team, USFWS Southeast Regional Office, Atlanta, Georgia 30345

IV. Location (attach map): See Figure 1 at the end of this document for a map indicating the proposed project area. The project area is located at Shell Point in Wakulla County. The length of beach is approximately 1 mile, with an approximate project area of about 4.5 acres.

A. Ecoregion Number and Name: Southeast Region

B. County and State: Wakulla County, Florida

C. Section, township, and range (or latitude and longitude): See Figure 1

D. Distance (miles) and direction to nearest town: see map (Figure 1)

V. Description of Proposed Action (attach additional pages as needed):

The proposed beach renourishment project is to improve and enhance the beach at Shell Point in Wakulla County (see Figure 1 for proposed project nourishment area). The proposed project includes placing approximately 15,000 cubic yards of sand along approximately 1 mile (a total of approximately 4.5 acres) of beach. Sand would be removed from existing permitted and licensed, commercial, upland borrow site(s) in Gadsden County, Florida using appropriate heavy equipment (e.g., dump trucks). The borrow sites are located approximately 45 miles northwest of Shell Point Beach project site. Figure 2 shows the location of the borrow pits, the proposed transport route, and the location of the project site. The sand mines or borrow pits are permitted by the Florida Department of Environmental Protection (DEP) Bureau of Mines and licensed by the Florida Department of Business and Professional Regulation.

The sand will be transported from the commercial sites to the Shell Point Beach by tri-axle dump trucks with a carrying capacity of 18 to 19 cubic yards. All of the trucks would transport the sand along existing paved State or County maintained highways (see Figure 2).

Sand used as part of this project would comply with requirements set forth in Florida DEP Rule 62B-41.007. The rule requires that any material placed on a Florida beach “maintains the general character and functionality of the material occurring on the beach and in the adjacent dune and coastal system” (62B-41.007(2)(j)). Sand placed at Shell Point would comply with all Florida DEP regulations, and Florida DEP would be consulted to ensure that the sand source is acceptable and all guidelines are properly adhered to.

Once the sand has been transported to the project site, it would then be placed on Shell Point Beach using bulldozers and/or front end loaders. Best management practices for shoreline and beach work would be implemented to ensure that natural resources are minimally disturbed during restoration activities to restore the width and historic slope/profile of this beach (see Figure 3). The created berm width from this activity would range between 25 and 50 feet at a constant elevation of +4.0 feet, NAVD 1988 and be graded to the landward edge of the mean high water line at varying slopes (see Figure 3). Based on this beach fill shape, there would be no work below the high tide line and no in-water work.

After appropriate permits are issued, restoration actions would be completed within approximately 18 months.

VI. Description of the Project Area (attach additional pages as needed):

The proposed project area is identified in Figure 1. The project area is located at Shell Point in Wakulla County. The length of beach is approximately 1 mile, with an approximate maximum project area of about 4.5 acres. The site is a narrow strip of beach below the high tide line and grassy area above the high tide line used for picnic pavilion, volleyball, and housing. The general area behind the project site (see Figure 1) has been the focus of considerable habitat manipulation in the past to support the development of the current nearby residential communities.

VII. Species and Habitat:

A. Complete the following table:

Table 1, provided at the end of this document, provides a summary of the different species that were identified and initially considered for the project's potential impacts. The information in this table was adopted from the U.S. Fish and Wildlife, Panama City office website: <http://www.fws.gov/panamacity/specieslist.html> which provides a county-based list of federal threatened, endangered, and other species of concern likely to occur in the Florida Panhandle.

VIII. Determination of Effects:

A. Explanation of effects of the action on species and critical habitats in item VII.A (attach additional pages as needed):

Table 2 presents a summary of the potential species/critical habitat that could be impacted from the proposed beach nourishment project. The species/critical habitat in Table 2 were identified after considering where there was potential overlap from information on identified natural communities in Table 1 with the potential locations where the project could be implemented and areas adjacent to the immediate project locations.

Table 2. Potential Impacts to Species/Critical Habitats

SPECIES/CRITICAL HABITAT	SPECIES/CRITICAL HABITAT IMPACTS
Green turtle ^a , Hawksbill turtle ^a , Kemp's ridley turtle; Leatherback turtle ^a , Loggerhead turtle	<p>Sea turtles are not known and have not been documented to nest on this beach, according to information available from the Florida Sea Turtle Nesting Beach Monitoring Program (see http://ocean.floridamarine.org/SeaTurtle/nesting/FlexViewer/). Very little beach is above the high tide line. Instead the area above the high tide line is open and grassy used for a picnic pavilion and volleyball court or housing. Any nests laid on this beach would likely be washed over during regular daily tidal events. Therefore no effects to any sea turtle species are anticipated.</p> <p>No designated or proposed critical habitat for sea turtles occurs within the action area; therefore, none will be adversely affected or modified.</p>
Piping plover	<p>In 2009, observations of at least one Piping plover were reported within or near the action area (ebird.org as of October 4, 2013). The proposed project will bury existing shoreline habitats only above the high tide line to the road where plovers are not expected to be feeding. The main risk to Piping plovers is from human disturbance while resting or foraging in habitats within the action area. The proposed project could result in short term increases in noise which could startle individuals, though we would expect normal activity to resume within minutes or cause the plovers to move to a nearby area and resume normal behaviors. Because other foraging/resting habitats are nearby (less than two miles) we would expect this temporary displacement to be within normal movement patterns and consider this effect insignificant and discountable.</p> <p>Piping plover critical habitat is not designated in or near the action area.</p>
Red knot	There are no documented records of red knot using the project area (ebird.org as of

SPECIES/CRITICAL	SPECIES/CRITICAL HABITAT IMPACTS
	<p>October 4, 2013). This likely reflects the disturbed nature of the habitat on this beach associated with the development of the community and the presence of nearby, more suitable habitats. However, potential wintering/migration foraging and resting habitat are present in nearshore habitats (sand bars/mudflats), generally within a half mile of the project location.</p> <p>The proposed project will bury existing shoreline habitats only above the high tide line to the road where plovers are not expected to be feeding. Therefore, the main risk to red knots is from human disturbance while resting and foraging in nearshore habitats close to work areas. The proposed project could result in short term increases in noise which could startle nearby individuals, though we would expect normal activity to resume within minutes or cause the red knots to move to a nearby area. Because the Red knot is not expected in the project area, only adjacent and other foraging/resting habitats are nearby (less than two miles) we would expect any temporary displacement to be within normal movement patterns and consider this effect insignificant and discountable.</p>

^a Critical habitat areas for these species are identified at <http://sero.nmfs.noaa.gov/pr/GISDataandMaps.htm>

B. Table 3. Explanation of actions (Conservation Measures) to be implemented to reduce adverse effects:

SPECIES	CONSERVATION MEASURES TO MINIMIZE IMPACTS
Piping plover and Red knot	Adhere to appropriate avoidance windows to the maximum extent possible (i.e., complete the project between May 15 and July 15).

VIII. Table 4. Effect Determination and Response Requested:

¹DETERMINATION/ RESPONSE REQUESTED:

Species	Species Impacts					Response Requested*
	NE	NLAA	MAA	JP	JC	
Green turtle; Hawksbill turtle; Kemp's ridley turtle; Leatherback turtle; loggerhead turtle	X					Concurrence – terrestrial habitats
Piping plover		X				Concurrence
Red knot		X				Conference

*Concurrence, Formal Consultation, Formal Conference

X. Bald Eagles

Are bald eagles present in the action area? ☒X___No ___Yes

If “Yes,” can you implement the conservation measures below? ___Yes ___No

1. If bald eagle breeding or nesting behaviors are observed or a nest is discovered or known, all activities (walking, camping, cleanup, use of a UTV, ATV, or boat) should avoid the nest by a minimum of 660 feet. If the nest is protected by a vegetated buffer where there is *no* line of sight to the nest, then the minimum avoidance distance is 330 feet. This avoidance distance shall be maintained from the onset of breeding/courtship behaviors until any eggs have hatched and eaglets have fledged (approximately 6 months).
2. If a similar activity (like driving on a roadway) is closer than 660 feet to a nest, then you may maintain a distance buffer as close to the nest as the existing tolerated activity.
3. If a vegetated buffer is present and there is no line of sight to the nest and a similar activity is closer than 330 feet to a nest, then you may maintain a distance buffer as close to the nest as the existing tolerated activity.
4. In some instances activities conducted within 660 feet of a nest may result in disturbance, particularly for the eagles occupying the Mississippi barrier islands. If an activity appears to cause initial disturbance, the activity shall stop and all individuals and equipment will be moved away until the eagles are no longer displaying disturbance behaviors.

If not, contact the Service’s Migratory Bird Permit Office to determine how to avoid impacts or if a permit may be needed.

XI. Migratory Birds

- A. Identify the species anticipated in the project area and behaviors (breeding, roosting, foraging) anticipated during project implementation.**

SPECIES	BEHAVIOR	SPECIES/HABITAT IMPACTS
Shorebirds/seabirds	Foraging, feeding, resting	Shorebirds forage, feed, and rest in the types of habitats consistent with the project area. As such, they may be impacted locally and temporarily by the project. It is expected that they would be able to move to another nearby location to continue foraging, feeding and resting. Nesting is not known in the project area. Therefore we do not anticipate impacts.

- B. If species or habitat impacts could occur, identify avoidance and minimization measures to prevent incidental take. Incidental take of Migratory Birds cannot be authorized.**

SPECIES/SPECIES GROUP	CONSERVATION MEASURES TO MINIMIZE IMPACTS
Shorebirds/sea birds	<p>To avoid impacts to any foraging or resting migratory birds, the following measures will be implemented:</p> <ul style="list-style-type: none"> - Driving on the beach for construction shall be limited to the minimum necessary within the designated travel corridor, which will be established just above or just below the primary "wrack" line. - Predator-proof trash receptacles shall be installed and maintained during construction at all beach access points used for the project construction to minimize the potential for attracting predators of migratory birds. - Workers shall be briefed on the importance of not littering and keeping the project area trash and debris free. - Educational signs shall be installed at public access points within the project area with emphasis on the importance of the beach habitat and wrack line for migratory birds. - When the project area has a pet or dog regulation, the provisions of the regulation shall be included on the educational signs.

XII. Signatures from the station preparing the Intra-Service Biological Evaluation:

/s/ Holly N. Blalock-Herod

January 16, 2014

Signature (originating station - preparer)

date

DOI Case Management Team, ESA Coordinator


Title



1/16/14

Signature (originating station)

date

 **Deputy Case Manager**

This analysis resulted in a determination that no "take" of a federally listed species would occur. If any of the following occur, then there must be reinitiation on this action:

- (1) any unforeseen circumstances arise or incidental take occurs
- (2) new information reveals effects of the Service's action that may affect listed species or critical habitat in a manner or to an extent not considered in this opinion;
- (3) the Service's action is later modified in a manner that causes an effect to the listed species or critical habitat not considered in this opinion; or
- (4) a new species is listed or critical habitat designated that may be affected by

the action.

In instances where any incidental take occurs, the operations causing such take must cease until reinitiation.

If reinitiation is required, contact the Panama City Ecological Services Field Office about the action.

US Fish and Wildlife Service
1601 Balboa Avenue
Panama City, FL 32405
Tel: 850-769-0552

XIII. Reviewing Ecological Services Office Evaluation:

A. Concurrence ☒ Nonconcurrence ☐

B. Formal consultation required ☐

C. Conference required ☐

D. Informal conference required ☐

E. Remarks (attach additional pages as needed):

Shell Point
RECEIVED
2/19/14



Signature

2/6/14

date

Donald W. [unclear]

Field Supervisor

PCFO

office

References

Dennis L. Jones Beach and Shore Preservation Act. 2003. §161.011-161.242 and §161.25-161.45 Florida Statutes.



Figure 1. Location of envisioned Shell Point Beach Nourishment Project.

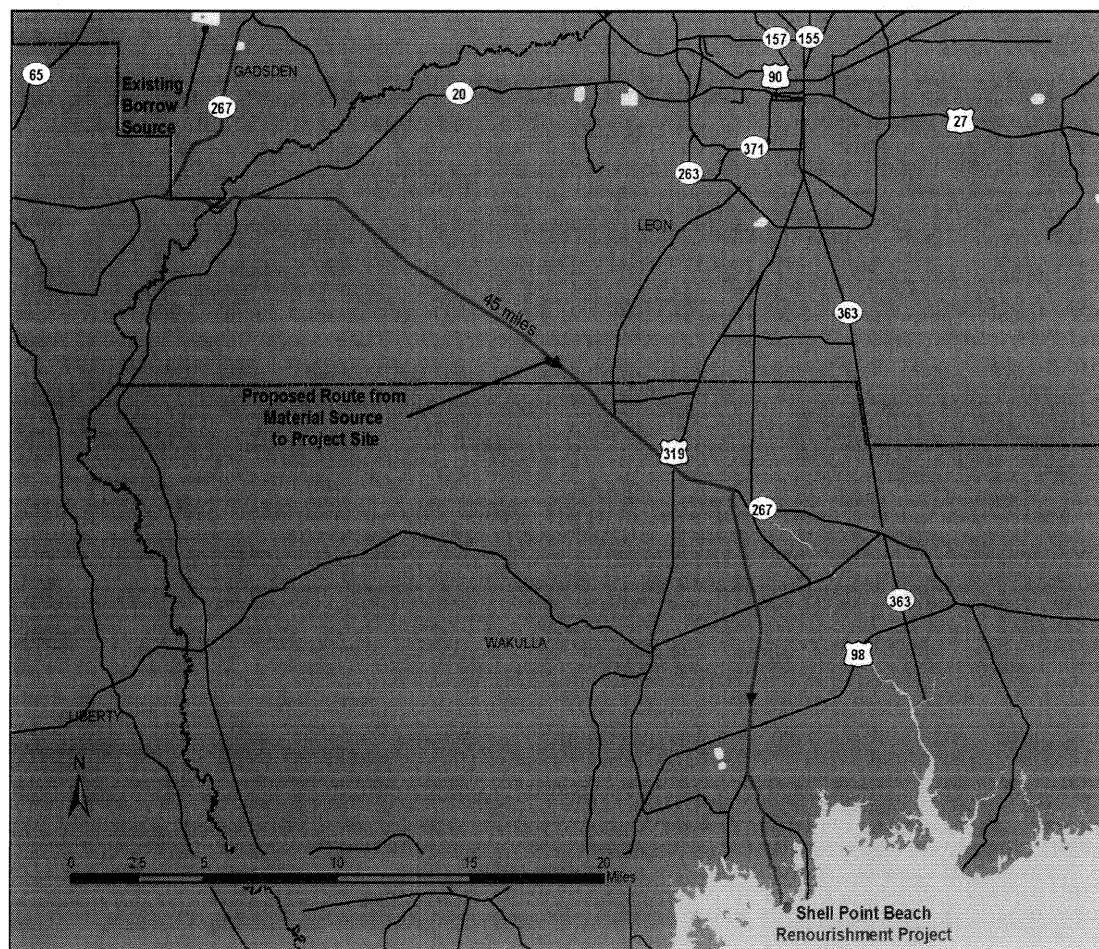


Figure 2. Location of upland borrow site(s)

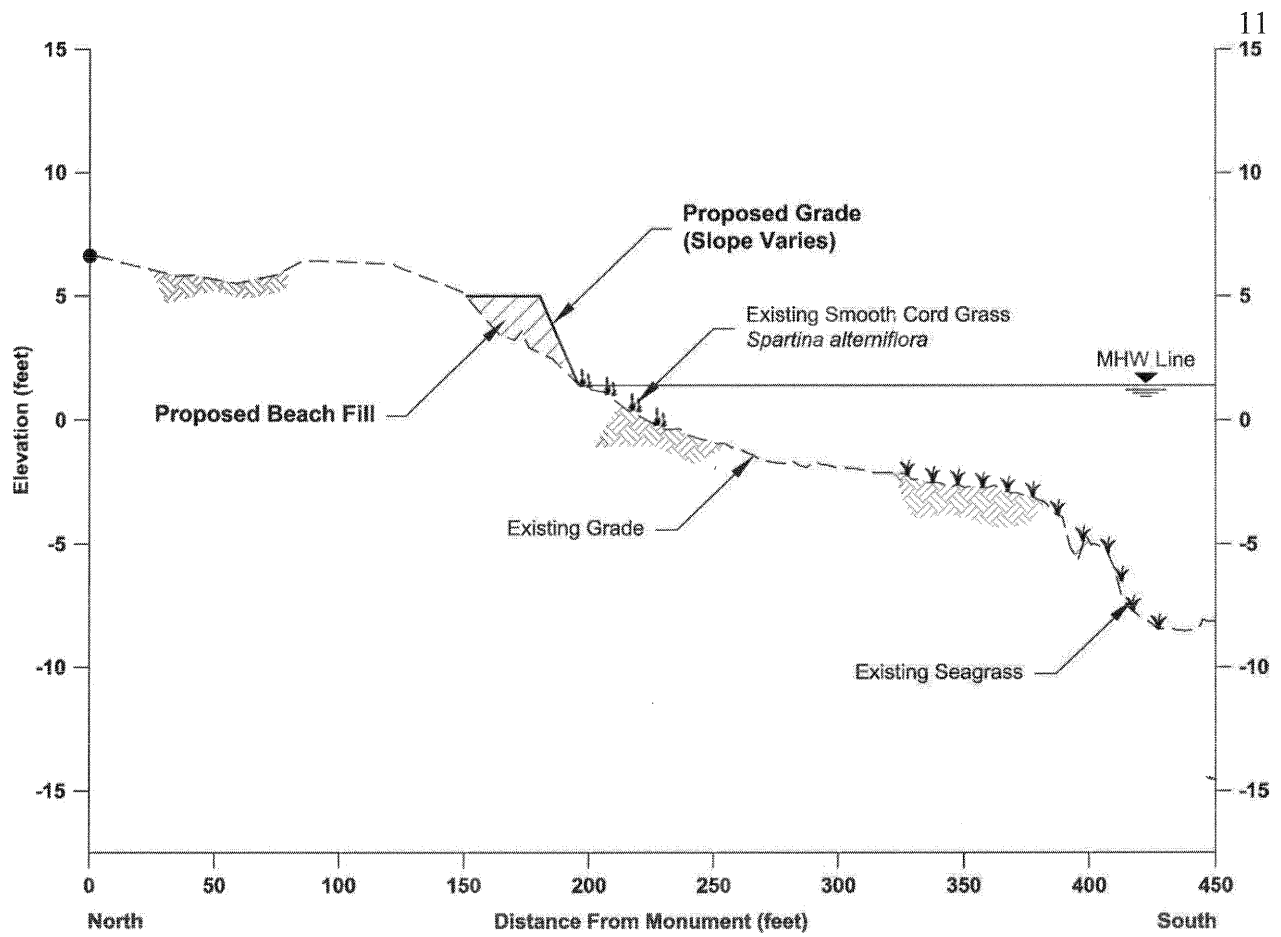


Figure 3. Typical cross section of proposed Shell Point beach nourishment.

Table 1. Species of Concern in Wakulla County, Florida.

Resource category	Common name	FWS status	State status	Natural communities	Species impacts (NE, NLAA, MAA)	Justification
Amphibians	Frosted flatwoods salamander	T (CH)		Palustrine: wet Flatwoods, dome swamp, basin swamp, Terrestrial: mesic flatwoods (reproduces in ephemeral wetlands within this community).	NE	Listed natural community is inconsistent with the project habitat
Amphibians	Gopher frog	SSC	ce	Terrestrial: sandhill, scrub, scrubby flatwoods, xeric hammock (reproduces in ephemeral wetlands within these communities).	NE	Listed natural community is inconsistent with the project habitat
Amphibians	Striped newt	C	SSC	Terrestrial: sandhills, scrub, scrubby flatwoods, xeric hammocks, coastal strand.	NE	Listed natural community is inconsistent with the project habitat
Birds	Arctic peregrine falcon	ce	E	Terrestrial: various, ruderal. Winters along coast	NE	Listed natural community is inconsistent with the project habitat
Birds	Bald eagle	BGEPA		Estuarine: marsh edges, tidal swamp, open water Lacustrine: swamp lakes, edges Palustrine: swamp, floodplain Riverine: shoreline, open water Terrestrial: pine and hardwood forests, clearings.	NE	Listed natural community is inconsistent with the project habitat
Birds	Least tern		T	Terrestrial: beach dune, ruderal. Nests common on rooftops.	NE	Listed natural community is inconsistent with the project habitat
Birds	Piping plover	T (CH)	T	Estuarine: exposed unconsolidated substrate Marine: exposed unconsolidated substrate Terrestrial: dunes, sandy beaches, and inlet areas. Mostly wintering and migrants.	See Table 2	See Table 2, 3, and 4
Birds	Red knot	P		Estuarine: exposed unconsolidated substrate Marine: exposed unconsolidated substrate Terrestrial: dunes, sandy beaches, and inlet areas. Mostly wintering and migrants.	See Table 2	See Table 2, 3, and 4
Birds	Red-cockaded woodpecker	E		Terrestrial: mature pine forests.	NE	Listed natural community is inconsistent with the project habitat
Birds	Reddish egret	ce	SSC	Estuarine: tidal swamp, depression marsh, bog, marl prairie, wet prairie Lacustrine: flatwoods/prairie lake, marsh lake Marine: tidal swamp.	NE	Listed natural community is inconsistent with the project habitat
Birds	Southeastern kestrel	ce	T	Terrestrial: open pine forests, clearings, ruderal, various.	NE	Listed natural community is inconsistent with the project habitat

Table 1. Species of Concern in Wakulla County, Florida.

Resource category	Common name	FWS status	State status	Natural communities	Species impacts (NE, NLAA, MAA)	Justification
Birds	Wakulla seaside sparrow	ce	SSC	Estuarine: tidal marsh Marine: tidal marsh.	NE	Listed natural community is inconsistent with the project habitat
Birds	Wood stork	E	E	Estuarine: marshes Lacustrine: floodplain lakes, marshes (feeding), various Palustrine: marshes, swamps, various.	NE	Listed natural community is inconsistent with the project habitat
Fish	Gulf sturgeon	T (CH)	SSC	Estuarine and Marine: sandy substrates for feeding and resting. Riverine: alluvial and blackwater streams.	NE	Listed natural community is inconsistent with the project habitat
Mammals	Florida black bear	ce	T	Palustrine: titi swamps, floodplains Terrestrial: pine and hardwood forests.	NE	Listed natural community is inconsistent with the project habitat
Mammals	West Indian manatee	E	E	Estuarine: submerged vegetation, open water Marine: open water, submerged vegetation Riverine: alluvial stream, blackwater stream, spring-run stream.	NE	Listed natural community is inconsistent with the project habitat
Mussels	Ochlocknee moccasin shell	E (CH)		Riverine: large creeks to medium-sized rivers in substrates of sand with some gravel in moderate current. Panhandle drainages: Ochlocknee River (upstream of Lake Talquin).	NE	Listed natural community is inconsistent with the project habitat
Mussels	Oval pigtoe	E (CH)		Riverine: medium-sized creeks to small rivers; various substrates; slow to moderate currents.	NE	Listed natural community is inconsistent with the project habitat
Mussels	Purple bank climber	T (CH)		Riverine: small to large rivers in sand, sand mixed with mud, or gravel substrates with slow to moderate currents. Panhandle drainages: Chipola, Apalachicola, and Ochlocknee Rivers.	NE	Listed natural community is inconsistent with the project habitat
Mussels	Shinyrayed pocketbook	E (CH)		Riverine: medium-sized creeks to mainstem rivers in a range of substrates including sand, clay, and gravel with slow to moderate current. Panhandle drainages: Econfinia (Creek), Chipola, and Ochlocknee (upstream of Lake Talquin) Rivers.	NE	Listed natural community is inconsistent with the project habitat
Plants	Ashe's magnolia		E	Terrestrial: slope and upland hardwood forest, ravines.	NE	Listed natural community is inconsistent with the project habitat
Plants	Bent golden aster	ce	E	Terrestrial: pine forest, ruderal.	NE	Listed natural community is inconsistent with the project habitat

Table 1. Species of Concern in Wakulla County, Florida.

Resource category	Common name	FWS status	State status	Natural communities	Species impacts (NE, NLAA, MAA)	Justification
Plants	Buckthorn		E	Palustrine: bottomland forest, dome swamp, floodplain forest Terrestrial: upland hardwood forest.	NE	Listed natural community is inconsistent with the project habitat
Plants	Chapman's sedge	ce		Palustrine: hydric hammock, floodplain forest Terrestrial: slope forest.	NE	Listed natural community is inconsistent with the project habitat
Plants	Corkwood		T	Estuarine: tidal marsh Palustrine: freshwater tidal swamp, hydric hammock.	NE	Listed natural community is inconsistent with the project habitat
Plants	Florida anise		T	Palustrine: floodplain forest, baygall Riverine: seepage stream bank Terrestrial: slope forest, seepage slope.	NE	Listed natural community is inconsistent with the project habitat
Plants	Flyr's brickellbush	ce	E	Terrestrial: upland hardwood forest, near streams.	NE	Listed natural community is inconsistent with the project habitat
Plants	Godfrey's spiderlily	ce		Estuarine: Brackish Marshes.	NE	Listed natural community is inconsistent with the project habitat
Plants	Godfrey's (violet) butterwort	T	E	Palustrine: wet flatwoods, wet prairie, bog; in shallow water Riverine: seepage slope; in shallow water. Also, roadside ditches and similar habitat.	NE	Listed natural community is inconsistent with the project habitat
Plants	Godfrey's blazing star	ce	E	Terrestrial: sandhill, scrub, coastal grassland; disturbed areas.	NE	Listed natural community is inconsistent with the project habitat
Plants	Green adder's mouth		E	Palustrine: floodplain forest Terrestrial: slope forest, upland mixed forest.	NE	Listed natural community is inconsistent with the project habitat
Plants	Hooded pitcher plant		T	Palustrine: wet flatwoods, wet prairie, seepage slope.	NE	Listed natural community is inconsistent with the project habitat
Plants	Large-leaved jointweed	ce	T	Terrestrial: scrub, sandpine/oak scrub ridges.	NE	Listed natural community is inconsistent with the project habitat
Plants	Panhandle Meadow-beauty	ce		Palustrine: Wetland obligate with moist sandy or peaty soils in full sunlight .	NE	Listed natural community is inconsistent with the project habitat
Plants	Parrot pitcher plant		T	Palustrine: wet flatwoods, wet prairie, seepage slope.	NE	Listed natural community is inconsistent with the project habitat
Plants	Scare-weed	ce	T	Terrestrial: mesic flatwoods, sand hill; on disturbed sites.	NE	Listed natural community is inconsistent with the project habitat
Plants	Snowy orchid		T	Palustrine: bogs.	NE	Listed natural community is inconsistent with the project habitat

Table 1. Species of Concern in Wakulla County, Florida.

Resource category	Common name	FWS status	State status	Natural communities	Species impacts (NE, NLAA, MAA)	Justification
Plants	Southern milkweed	ce	T	Palustrine: wet prairie, seepage slope edges Riverine: seepage stream banks Terrestrial: mesic flatwoods, drainage ditches.	NE	Listed natural community is inconsistent with the project habitat
Plants	Southern red lily		T	Palustrine: wet prairie, wet flatwoods, seepage slope Terrestrial: mesic flatwoods, seepage slope; usually with grasses.	NE	Listed natural community is inconsistent with the project habitat
Plants	Washington thorn		E	Palustrine: basin swamp, basin marsh, edges of wet areas.	NE	Listed natural community is inconsistent with the project habitat
Plants	Wild coco	ce	T	Terrestrial: pine Rockland, upland hardwood forest, scrubby flatwoods, mesic flatwoods; on moist sand.	NE	Listed natural community is inconsistent with the project habitat
Plants	Wiregrass gentian	ce	E	Palustrine: seepage slope, wet prairie, roadside ditches Terrestrial: mesic flatwoods, planted slash pine.	NE	Listed natural community is inconsistent with the project habitat
Plants	Yellow butterwort		T	Palustrine: flatwoods, bogs.	NE	Listed natural community is inconsistent with the project habitat
Plants	Yellow fringeless orchid	ce	E	Palustrine: wet prairie, seepage slope Terrestrial: mesic flatwoods.	NE	Listed natural community is inconsistent with the project habitat
Reptiles	Alligator snapping turtle	ce	SSC	Estuarine: tidal marsh Lacustrine: river floodplain lake, swamp lake Riverine: alluvial stream, blackwater stream.	NE	Listed natural community is inconsistent with the project habitat
Reptiles	Eastern indigo snake	T	T	Estuarine: tidal swamp Palustrine: hydric hammock, wet Flatwoods Terrestrial: mesic flatwoods, upland pine forest, sand hills, scrub, scrubby flatwoods, rockland hammock, ruderal.	NE	Listed natural community is inconsistent with the project habitat
Reptiles	Florida pine snake	ce	SSC	Lacustrine: ruderal, sandhill upland lake Terrestrial: flatwoods, xeric hammock, ruderal.	NE	Listed natural community is inconsistent with the project habitat
Reptiles	Gopher tortoise	C	SSC	Terrestrial: sandhills, scrub, scrubby flatwoods, xeric hammocks, coastal strand, ruderal.	NE	Listed natural community is inconsistent with the project habitat
Reptiles	Green turtle	E	E	Terrestrial: sandy beaches; nesting.	NE	See Table 2, 3, and 4
Reptiles	Hawksbill turtle	E	E	Marine: open water; Terrestrial: sandy beaches; nesting.	See Table 2	See Table 2, 3, and 4

